



March 20, 2013

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: United States Cellular Corporation

WT No 12-69

Dear Ms. Dortch:

We write today in response to a letter filed in this proceeding on March 1, 2013 by AT&T. Although AT&T's letter offers no new facts or information for the record, we feel compelled to clarify several prior points that are important for the Commission's consideration in light of AT&T's letter.

U.S. Cellular Dual-Band Approach Only Requires a Single Device Port

Our proposal for a dual Band 12/17 solution only requires the use of one lower port on an AT&T LTE device. A Band 17 duplexer is replaced from AT&T's devices with a Band 12 duplexer. Software will allow the device to support both a Band 12 network and a Band 17 network. No changes will be necessary to AT&T's network and AT&T's existing Band 17 devices can continue to operate for as long as AT&T continues to operate a Band 17 network. The dual band 12/17 solution will allow devices to operate on a Band 12 or a Band 17 network and support roaming on either network.

3GPP Standards Will Remain Intact

Contrary to what AT&T suggests, under the U.S. Cellular proposal, the FCC will not be interfering with the 3GPP process. AT&T will be free to continue to operate its existing Band 17 network with its existing Band 17 devices. AT&T also notes the recent filings by the Dish Network indicating a desire to commence high power operations in a limited set of markets. As we have indicated previously in this

docket, we believe testing demonstrates that dual band 12/17 devices are capable of meeting existing 3GPP Band 17 E Block interference protection standards.¹

U.S. Cellular lacks AT&T's Scale to Drive Device Customization in the Device Marketplace

We read with interest AT&T's suggestion that U.S. Cellular's own estimates for developing Band 12 devices is "preposterous, as AT&T has confirmed in discussions with device manufacturers." We wish AT&T would name those manufacturers so Commission staff could independently evaluate the validity of their statement. Device manufacturers continue to demand enormous volume commitments to recover fixed development costs for Band 12 platforms, or they outright refuse to build Band 12 equipment. U.S. Cellular has aggregated significant handset volume with a single manufacturer to obtain a hand-full of devices. That feat is not scalable to other OEMs without significant additional volume. As we have explained previously, interoperability will drive OEM's to create one single device platform that can be leveraged by all Lower 700 MHz A Block holders including AT&T and U.S. Cellular. The savings to A Block holders will be in the hundreds of millions of dollars and the costs to AT&T will be less than \$2 million to implement potential device certification costs.

The Record is Clear - No Customer Impacting Interference Concerns Exist

AT&T attacks the VCOMM field testing by asserting that the field test submission discloses only averages of the field test readings but this assertion is inaccurate. The downlink performance of field testing in the Waterloo market were presented as mapped drive test files by V-Comm (Oct 26, 2012 Ex Parte Reply Comments). These maps show downlink performance and other key performance indicators collected along the test route (PDSCH Total BLER, PDSCH Total DL Throughput, Serving RSRP, & Serving RS SNR). Specifically "Figure 5 -Waterloo, IA UE DL Throughput Drive Test Results for 10 MHz B+C Market" shows strong device downlink throughput in the south-eastern most leg of the drive; an area of greatest TV51 signal strength (> -30 dBmW) and furthest from the serving cell. The test case specifically mimics the scenario described by AT&T to cause Reverse IM interference to the device that purportedly would cause downgraded downlink performance. This data was collected and presented using industry standard practices to depict geographic specific network performance and is not averaged across the Waterloo Market.

AT&T continues to talk about interference concerns but fails to provide any real world test results that involve fielding testing of actual devices. A Block license holders have placed multiple real world tests in the record and those tests conclusively demonstrate a lack of documented customer impacting interference in

¹ U.S. Cellular Ex Parte December 3, 2012, p. 1.

the devices deployed by U.S. Cellular. If AT&T has possession of contrary real world test results, it should place that evidence in the record.

CDMA-GSM Debate is a Short Term Distraction

AT&T goes to great lengths to attempt to cloud the debate by drawing attention to the fact that U.S. Cellular has historically ordered devices based upon CDMA platforms. It is true that U.S. Cellular today orders devices that include CDMA technology. However, U.S. Cellular also purchases devices today that support both CDMA and GSM technologies. The Commission must also focus on the fact that the impending arrival of VoLTE in 2013/2014 will rapidly eliminate the necessity of CDMA support in devices. It is also important to remember that other A Block holders may or may not choose to move forward with CDMA based deployments and that even CDMA carriers have options such as the wholesale purchase of GSM voice service to avoid the issue altogether. In short, this debate is tangential and will soon be totally irrelevant. The Commission must focus on the long term real world benefits that will come from restoring interoperability.

All Consumers Deserve Choice

We applaud AT&T for recognizing consumers' desire cutting edge devices and the impact that a lack of availability of such devices would have on "AT&T's competitive position vis-a-vis other providers". This is exactly why the Commission must act to restore a level playing field to the device marketplace. As stated above, the U.S. Cellular solution does not require AT&T to add additional ports to its devices or to place itself at some sort of competitive disadvantage. AT&T will still have open ports to address its consumers' needs for things like international roaming. The benefits of extending interoperability across lower 700 MHz will actually allow all customers (including those of AT&T and U.S. Cellular) to have additional DOMESTIC as well as international roaming options.

In summary, we urge the Commission to act quickly to resolve interoperability and we remain willing to meet with the Bureau or the Commissioners to discuss any additional questions.

Sincerely,

/S/

Grant B Spellmeyer, Esq.
Executive Director – Federal Affairs & Public Policy